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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8
9 QBE INSURANCE CORPORATION, CASE NO.: 2:20-cv-02104-RFB-EJY
individually,

10 Plaintiff,

11 vs.

12
13 SIMONE RUSSO, RICHARD DUSLAK and
JUSTIN SESMAN,

14 Defendants.

15 RICHARD DUSLAK and JUSTIN SESMAN,

16 Counterclaimants,

17 vs.

18 QBE INSURANCE CORPORATION,

19 Counter-Defendants.

20 RICHARD DUSLAK and JUSTIN SESMAN,

21 Third-Party Plaintiffs,

22 vs.

23
24 SUNRISE VILLAS IX HOMEOWNERS'
25 ASSOCIATION; DOES I-X AND ROE
BUSINESS ENTITIES I-X,

26 Third-Party Defendants.

27 AND ALL RELATED CLAIMS
28

**STIPULATION AND ORDER TO
CONDUCT EXPERT DEPOSITIONS AFTER
THE CLOSE OF DISCOVERY**

**STIPULATION AND ORDER TO CONDUCT EXPERT DEPOSITIONS AFTER THE CLOSE
OF DISCOVERY**

Defendants/Counterclaimants/Third-Party Plaintiffs RICHARD DUSLAK and JUSTIN SESMAN, Third-Party Defendant SUNRISE VILLAS IX HOMEOWNERS' ASSOCIATION, Plaintiff/Counter-defendant QBE INSURANCE CORPORATION, Third-Party Defendant AMANDA DAVIS and Defendant SIMONE RUSSO, by and through their respective counsel of record, do hereby stipulate to allow the depositions of the following expert witnesses disclosed in this matter to be conducted after the discovery deadline of December 22, 2021 and prior to the trial date in this matter:

Mark Falkenhagen

Richard Vavra

Stan Smith

Steven Plitt

Thomas Ireland

Good cause exists to take the expert depositions in this matter after the close of discovery due to scheduling difficulties in this matter and to avoid unnecessary duplication of efforts. Due to trial schedules and holiday schedules, both for counsel and the experts, scheduling these depositions at a time that is convenient for both the parties and experts has not been possible within the discovery period. Additionally, the experts in this case will need to review the deposition testimony of the parties, to include Amanda Davis (deposed on December 6, 2021) , the 30(b)(6) witnesses of Sunrise (scheduled to be deposed on December 22, 2021) and the 30(b)(6) witness of QBE (not yet scheduled as subject to a Motion for Protective Order - Dkt. No. 138). To avoid duplication of efforts, including the likelihood of needing to re-depose the experts once the 30(b)(6) for QBE has testified, the parties agree to avoid wasting time and resources the expert depositions in this matter should go forward after the testimony of all of QBE's 30(b)(6) witness.

Therefore, the parties stipulate to take the depositions of experts after the December 22, 2021 deadline to complete discovery and after the deposition of QBE's 30(b)(6) Witness.

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: December 22, 2021

DATED this 21st day of December, 2021.

DATED this 21st day of December, 2021.

BIGHORN LAW

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ASSOCIATION*

DATED this 21st day of December, 2021.

DATED this 21st day of December, 2021.

MORALES, FIERRO & REEVES

**THE LAW OFFICE OF DAVID
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DATED this 21st day of December, 2021.

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